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April 2, 2008

The Honorable George Hawkins
Director
District of Columbia Department of the Environment
51 N Street NE, 6th Floor
Washington, DC 20002

Dear Director Hawkins:

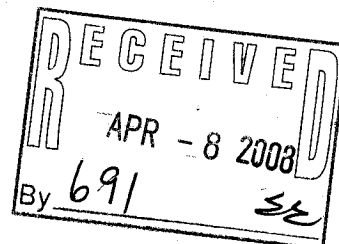
Chevron is writing in response to your information request dated March 20, 2007 [sic], and received on March 21, 2008.

In this request, the District asks that Chevron provide copies of any and all results of samples it and/or its contractors, consultants, agents or employees have taken and/or are taking at or concerning Riggs Park, Washington, DC, residences, including any media (soil, groundwater, soil vapor, indoor air). Chevron notes that it has previously produced the requested information to the District of Columbia and has filed corresponding reports as appropriate in the library repository.

The District's request particularly notes that the data should include the results of all samples collected and all analytes evaluated using EPA Test Method TO-15. Chevron has previously provided all of the data it received from the laboratories to the United States Environmental Protection Agency, the District, and Maryland Department of the Environment. The enclosed compact disc media present all of the information currently in Chevron's possession responsive to this specific request.

We understand from conversations with District officials and with Councilmember Bowser that DCDOE may be interested in TO-15 analysis for compounds other than the gasoline-related compounds benzene, toluene, ethylbenzene, xylenes (BTEX) and methyl tert butyl ether (MTBE) (hereafter referred to as gasoline-range organics [GRO]). As you may be aware, the workplan approved by the United States Environmental Protection Agency and reviewed by the District's Department of Health (DCDOH) did not plan to collect or analyze samples or generate data beyond the GRO analytes; nor did DCDOH's comments on the draft workplan seek such additional analytical data. The requested data/analyte suite was chosen based upon the gasoline range compounds in the groundwater and did not include other non-gasoline compounds routinely included in a full TO-15 analyte suite.

Nonetheless, Chevron shares the District's concern about potential risk to public health in Riggs Park, including any risks attributable to sources other than impacts as a result of the operation of the former Chevron station. Accordingly, Chevron responded to your information request by immediately requesting Air Toxics to preserve any data or analysis it may have discarded or excluded from Chevron's reports because the data or analysis was beyond the scope of the workplan. We further asked Air Toxics to prepare an inventory of any data and analysis it may have that would be responsive to your request. A copy of our directive to Air Toxics is enclosed.



Following its initial review, Air Toxics has advised Chevron that the chromatograph data originally generated in the TO-15 scan for GROs can be retrieved from Air Toxics' archived data tapes. Air Toxics has advised that those same chromatographs can be reviewed to identify any non-GROs present in the samples. That additional chromatograph analysis was not performed because it was beyond the scope of the approved work scope and thus not requested by Chevron. Although the data can be generated, Chevron notes that any such analysis at this point in time would be of limited utility for several reasons:

- The summa canisters provided to Gannett Fleming and used to collect the samples were one hundred percent certified for the target list of analytes that were required in the work plan (i.e., the GROs). The laboratory did not certify that the canister was clean for any other analytes. Therefore, it is possible that any detection of analytes other than the GROs could have come from a previous sample in the canister or incomplete cleaning, etc. At this point, it would be impossible for the laboratory to determine if the canisters were completely clean prior to introduction of the sample.
- The Air Toxics lab conducts daily continuing calibration verification (CCV) and Laboratory Control Spike (LCS) to make sure that their instruments are performing properly. These procedures are specific to the compounds being analyzed and have specific control limits that must be met. While the GRO compounds were within control limits, it is probable that the control limits for some other compounds, such as the non-GROs, were not met. Because CCV and LCS for the non-GROs cannot be re-analyzed for compounds out of control limits, a portion of the data generated would have to be qualified as "estimated". Thus, use of these data should be limited to screening.

Given these limitations of the data, Chevron believes that even if Air Toxics were to review the archived chromatograph data, the results would not be appropriate for use in a risk assessment. The consequent potential to distort any risk assessment in which these data are used, or to mislead residents concerning the levels of compounds present, outweighs any value that the data may present.

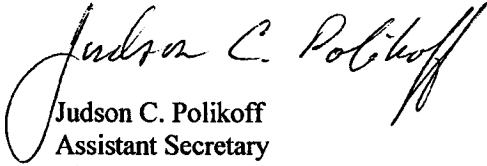
Chevron requests that the District clarify whether further analysis of the archived data, with the recited limitations, is in fact of interest to DCDOE. Chevron is prepared to undertake reasonable measures and incur some expense to perform the additional review and analysis and to produce additional data. This is true even though such non-GRO data would, by its very definition, concern compounds and potential risks that are not even arguably attributable to the former Chevron station. Consequently, the request for this data is beyond the scope of the statutes on which DCDOE purported to base its request for information.

Chevron welcomes the opportunity to assist the District as appropriate. However, Chevron wants to make clear that the District's March 20 Information Request concerns data not previously developed nor in possession of Chevron or its contractor Gannett Fleming, that it asks for data of limited value in understanding risk due to the fact it was not part of the original Data Quality Objective of the project, and that the data contains non-GRO compounds which cannot be linked to former Chevron Facility 122208 or the associated groundwater plume.

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We look forward to direction from the District concerning any additional data and analyses that might be useful. In the meantime, Chevron understands that this submittal fully responds to the District's March 20, 2008 Information Request.

Sincerely,

A handwritten signature in cursive script, reading "Judson C. Polikoff". The signature is written in dark ink and is positioned above the printed name and title.

Judson C. Polikoff
Assistant Secretary
Chevron U.S.A. Inc.

cc: Councilmember Muriel Bowser
Bicky Corman, General Counsel
Rob Scrafford, Gannett Fleming